



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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DOUGLAS P. SCOTT, DIRECTOR

(217) 557-8155  
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July 31, 2007

Engineering Field Activity, Midwest  
Attn: Mr. Howard Hickey  
Building 1A, Code 931  
2703 Sheridan Road, Suite #120  
Great Lakes, Illinois 60088-5600

Re: Electrical Resistance Heating (ERH)  
Treatability Study Report for Site 22  
Former Building 105 Old Dry Cleaning Facility  
Naval Station Great Lakes  
Great Lakes, Illinois

0971255048 – Lake  
Great Lakes Naval Station  
Superfund/Technical

Dear Mr. Hickey:

The Illinois Environmental Protection Agency (Illinois EPA or Agency) is in receipt of the submitted Electrical Resistance Heating (ERH) Treatability Study Report for Site 22, Former Building 105 Old Dry Cleaning Facility, Naval Station Great Lakes. It was drafted by Tetra Tech NUS, Inc. on behalf of the Naval Facilities Engineering Command (Navy). It was dated May 2007 and was received on June 7, 2007. The Agency has reviewed the document and is providing the following comments on the document itself.

- 1) **First Page** – Please remove the signature block for the Illinois EPA Project Manager. Agency personnel do not typically sign off on this type of document. The Navy may leave the project manager's name under the heading of "*Prepared Under the Supervision of*", just not the signature line.
- 2) **Section 5.2** – Another recommendation that should be stated here is that this site will need to be formally added to the Land Use Control Memorandum of Agreement (LUCMOA) between the Navy and Illinois EPA. Having it as part of the LUCMOA will ensure that the required steps discussed therein are monitored and enforced.
- 3) **Appendix F** – The Chain of Custody forms numbered 3794 and 2151 do not have "Received by" signatures, dates, and times.

Based upon Illinois EPA's review of the submittal, RCRA closure of Site 22 (Building 105) relative to soil should be considered complete once the Final Record of Decision is submitted and the institutional controls meeting the requirements of 35 Illinois Administrative Code (IAC) 742 are established with the following restrictions for the subject property:

- a. The property will be restricted to industrial and commercial purposes.
- b. The engineered barrier, a cap system composed of a high-density polyethylene liner and an asphalt parking lot, will be maintained.
- c. A site safety plan to address possible worker exposure to the soil and shallow groundwater must be developed and implemented during any future excavation/construction in this area.
- d. Any soil removed from this area during future activities must be managed in accordance with 35 IAC, Subtitle G: Waste Disposal.
- e. Restrict potable use of the groundwater at the facility.

Finally, a Land Use Control Implementation Plan (LUCIP) for this site must be prepared and appended to the LUCMOA in accordance with the terms of that agreement.

The Record of Decision will also need to address closure for the groundwater exposure pathway. Illinois EPA has on several occasions described appropriate methods for the Navy to pursue an appropriate closure demonstration for groundwater as noted in the following letters: (1) Conditions 3 and 4 of the September 9, 1996 letter (Log No. C-689-M-3); (2) Condition 5 of the February 21, 1997 letter (Log No. C-689-M-4); (3) Conditions 9 and 10 of the March 31, 1998 letter (Log No. C-689-M-5); (4) Conditions 7 through 11 of the March 10, 1999 letter (Log No. C-689-M-6); (5) and Condition 6 of the June 29, 2001 letter, which was subsequently provided in the September 7, 2001 correction letter (Log No. C-689-M-7). These letters are provided as Attachments 1 through 5 to this letter. The referenced conditions were required for proper closure of the RCRA Storage Unit.

Illinois EPA suggests the Navy address the groundwater associated with the RCRA Unit Building 105 according to one or more of the following recommendations:

1. If the Navy proposes to conduct no further remediation, groundwater contamination must continue to be addressed in accordance with 35 IAC, Part 725, and all Illinois EPA letters associated with RCRA Closure of Building 105. Therefore, groundwater known to be impacted by activities associated with Building 105 must be sampled on a quarterly basis and reported to the Illinois EPA in accordance with the schedule listed in Condition 2 below.

2. A minimum of four (4) additional sampling events must be conducted at all monitoring wells associated with Building 105 to demonstrate clean closure of the unit. These sampling events must demonstrate that four (4) consecutive sampling events indicate no exceedances of Class I Groundwater Quality Standards (GQS). The first sample must be collected during the months of August or September 2007, in accordance with the following schedule:

<u>Samples to be Collected During The Months of</u>	<u>Results Submitted to the Illinois EPA by the Following</u>
First Quarter	April 15
Second Quarter	July 15
Third Quarter	October 15
Fourth Quarter	January 15

3. The Navy must analyze groundwater samples required by Conditions 1 and 2 above for the following constituents of concern (COCs): chloromethane, cis-1,2-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene, trichloroethene, and vinyl chloride.

All information required by Conditions 1 and 2 above, as well as, any future correspondence associated with the RCRA Unit Building 105, must be submitted to the following address:

Stephen F. Nightingale, P.E.  
Illinois Environmental Protection Agency  
Bureau of Land/Permit Section #33  
1021 North Grand Avenue East  
Springfield, Illinois 62702

4. If the Navy chooses to pursue a risk-based closure for groundwater or to pursue the exclusion of the Groundwater Ingestion Exposure Route, the facility must submit the appropriate demonstration/documentation in accordance with 35 IAC 742, Illinois EPA's Tiered Approach to Corrective Action Objectives (TACO). That may include, but is not limited to, the following:
  - a. Submit a Tier II or Tier III demonstration in accordance with 35 IAC 742 (TACO); or
  - b. Pursue the exclusion of the Groundwater Ingestion Exposure Route, as provided in Subpart C of TACO, Part 742.320 specifically; or

- c. Provide evidence that groundwater contamination is not statistically significant, in accordance with methods outlined in 35 Ill. Adm. Code, 724.197(h).

Provided the Navy addresses the groundwater according to one of the above-listed options and submits the appropriate documentation, RCRA closure of Site 22 (Building 105) relative to groundwater should be considered complete once the Final Record of Decision is submitted and the previously mentioned institutional controls are established.

If you have any questions regarding anything in this letter or require any additional information, please contact me at (217) 557-8155 or by electronic mail at [Brian.Conrath@illinois.gov](mailto:Brian.Conrath@illinois.gov). If you have specific questions regarding the RCRA groundwater issue, you may also contact Amy Boley at (217) 558-4716.

Sincerely,

*Brian A. Conrath*

Brian A. Conrath  
Remedial Project Manager  
Federal Facilities Unit  
Federal Site Remediation Section  
Bureau of Land

  
BAC:rac:H\GLN\TC\Site22\Site22ERHrpt

Attachments

- Attachment 1: September 9, 1996 Illinois EPA Letter (Log No. C-689-M-3)  
Attachment 2: February 21, 1997 Illinois EPA Letter (Log No. C-689-M-4)  
Attachment 3: March 31, 1998 Illinois EPA Letter (Log No. C-689-M-5)  
Attachment 4: March 10, 1999 Illinois EPA Letter (Log No. C-689-M-6)  
Attachment 5: June 29, 2001 Illinois EPA Letter and September 7, 2001 Illinois EPA  
Correction Letter (Log No. C-689-M-7)

cc: Bob Davis, Tetra Tech NUS, Inc.  
Bill Sinnott, RCRA

Owen Thompson, USEPA (SR-6J)  
Amy Boley, RCRA